

1 Gregg S. Kleiner, State Bar No. 141311
RINCON LAW LLP
2 268 Bush Street, Suite 3335
San Francisco, CA 94104
3 Telephone No.: 415-672-5991
Facsimile No.: 415-680-1712
4 Email: gkleiner@rinconlawllp.com

5 Counsel for FRED HJELMESET,
6 Trustee in Bankruptcy

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re

12 EVANDER FRANK KANE,
13 Debtor.

Case No. 21-50028 SLJ
Chapter 7
Hon. Stephen L. Johnson

**FOURTH STIPULATION TO ENTRY OF
ORDER EXTENDING DATE FOR FILING
COMPLAINT
(11 U.S.C. SECTION 727)**

[No Hearing Requested]

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18 This fourth stipulation is entered into by and between Evander Frank Kane (“Debtor”) and
19 Fred Hjelmset, Trustee in Bankruptcy of the Debtor’s estate (“Trustee”), through their respective
20 counsel.

21 **RECITALS**

- 22 A. On January 9, 2021, the Debtor filed a Voluntary Chapter 7 Petition.
23 B. On January 11, 2021, the Bankruptcy Court issued its “Notice of Chapter 7
24 Bankruptcy Case,” Docket 4 (“Notice”).
25 C. The Notice provided that the deadline for filing complaints against the Debtor for
26 non-dischargeability or denial of discharge was April 5, 2021.

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1 D. On March 22, 2021, the Trustee caused to be filed the Stipulation to Entry of Order
2 Extending Date for Filing Complaint (11 U.S.C. Section 727) as Docket 68, which stipulation was
3 approved by the Order Extending Date for Filing Complaint Objecting to Discharge (11 U.S.C.
4 Section 727) entered March 22, 2021 as Docket 70, which order extended the deadline established
5 by Rule 4004 of the Federal Rules of Bankruptcy Procedure to object to the Debtor's discharge
6 through and including May 5, 2021.

7 E. On April 22, 2021, the Trustee caused to be filed the Second Stipulation to Entry of
8 Order Extending Date for Filing Complaint (11 U.S.C. Section 727) as Docket 104, which
9 stipulation was approved by the Order Extending Date for Filing Complaint Objecting to Discharge
10 (11 U.S.C. Section 727) entered April 23, 2021 as Docket 105 (the "Order"). The Order extended
11 the deadline established by Rule 4004 of the Federal Rules of Bankruptcy Procedure to object to the
12 Debtor's discharge through and including June 11, 2021.

13 F. On May 28, 2021, the Trustee caused to be filed the Third Stipulation to Entry of
14 Order Extending Date for Filing Complaint (11 U.S.C. Section 727) as Docket 149, which
15 stipulation was approved by the Order Extending Date for Filing Complaint Objecting to Discharge
16 (11 U.S.C. Section 727) entered May 28, 2021 as Docket 150 (the "Order"). The Order extended
17 the deadline established by Rule 4004 of the Federal Rules of Bankruptcy Procedure to object to the
18 Debtor's discharge through and including August 19, 2021.

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20 **STIPULATION**
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22 NOW, THEREFORE, the parties agree as follows:

23 1. With regard to any complaints that would have to be filed by the Trustee in
24 conformity with Bankruptcy Code Section 727 (11 U.S.C. § 727) and Rule 4004 of the Federal
25 Rules of Bankruptcy Procedure (i.e., discharge of debt) shall be extended for approximately 61 days
26 from the current deadline of August 19, 2021 through and including October 19, 2021.

27 2. The parties further agree that the new deadline, October 19, 2021, may be further
28 extended by stipulation of the parties.

1 3. The parties agree to entry of an order in the form annexed hereto as **Exhibit A**.

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DATED: August 16, 2021 RINCON LAW LLP

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By: /s/ Gregg S. Kleiner
GREGG S. KLEINER
Counsel for FRED HJELMESET,
Trustee in Bankruptcy

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DATED: August 17, 2021 FINESTONE HAYES LLP

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By: Stephen D. Finestone
STEPHEN D. FINESTONE
Counsel for Debtor,
EVANDER FRANK KANE

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1 Gregg S. Kleiner (SBN 141311)
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4 San Francisco, CA 94104
5 Tel. 415-672-5991
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7 gkleiner@rinconlawllp.com

8 Counsel for
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14 In re

15 EVANDER FRANK KANE,
16 Debtor.

Case No. 21-50028 SLJ
Chapter 7
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**FOURTH ORDER EXTENDING DATE
FOR FILING COMPLAINT OBJECTING
TO DISCHARGE
(11 U.S.C. SECTION 727)**

17 Based on the Fourth Stipulation to Entry of Order Extending Date for Filing Complaint (11
18 U.S.C. Section 727) (the "Stipulation") entered into by and between Fred Hjelmset, Trustee in
19 Bankruptcy of the Debtor's estate and Debtor Evander Frank Kane, through their respective counsel,
20 electronically filed on August ____, 2021, as Docket No. ____,

21 IT IS HEREBY ORDERED, as follows:

- 22 1. The Stipulation is approved.
- 23 2. With regard to the Trustee, the current deadline established by Rule 4004 of the
24 Federal Rules of Bankruptcy Procedure to object to the Debtor's discharge is hereby extended
25 through and including October 19, 2021.

26 *** **END OF ORDER** ***
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EXHIBIT A

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*** *COURT SERVICE LIST* ***

No Court service required.